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11
12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 **United States of America,**

16 Plaintiff,

17 v.

18 **Carlos Vasquez,**

19 Defendant.

20 Case Number: cr13-0335-SI

21 Date: March 21, 2014

22 Time: 11:00 a.m.

23 **STIPULATION AND [PROPOSED]
24 ORDER CONTINUING MATTER AND
25 EXCLUDING TIME UNDER 18 U.S.C. §
26 3161**

27 On February 7, 2014, the parties made a status appearance before the Court. During that
28 appearance, the government explained that it intended to seek another indictment against the defendant.
The parties requested that the matter be continued until March 21, 2014.

On March 6, 2014, Mr. Vasquez was charged in an indictment, case number cr-14-120-CRB,
alleging violation of numerous counts, including 18 U.S.C. § 1962(d) — Racketeering Conspiracy; 18
U.S.C. § 1959 (a)(5) — Conspiracy to Commit Murder in Aid of Racketeering Activity; 18 U.S.C. § 1959
(a)(6) — Conspiracy to Commit Assault with a Dangerous Weapon in Aid of Racketeering Activity; 18
U.S.C. §§ 1959(a)(1) and 2 — Murder in Aid of Racketeering Activity; 18 U.S.C. §§ 924(c)(1)(A) and 2
— Possession, Carrying, and Using a Firearm in Furtherance of, or During and in Relation to, a Crime of
Violence; and 18 U.S.C. §§ 924(j) and (2) — Use/Possession of Firearm in Furtherance of Crime of

[Proposed] Stipulation to Continue and Exclude Time
cr-13-0335 SI

1 Violence, Resulting in Death.

2 In light of the pending charges against Mr. Vasquez in the newly charged case, the parties request
3 that this case be continued for three months to June 27, 2014, so that defense counsel will have an
4 opportunity to evaluate the new charges and advise Mr. Vasquez accordingly.

5 The parties request that the time between March 21, 2014, and June 27, 2014, be excluded from
6 the running of the speedy trial clock for effective preparation of counsel, 18 U.S.C. § 3161(h)(7)(B)(iv).

7

8 SO STIPULATED:

9

10 Dated: March 14, 2014

11 */s/ Andrew M. Scoble*
12 ANDREW M. SCOBLE
13 Assistant United States Attorney

14 Dated: March 14, 2014

15 */s/ Natalie Lee*
16 NATALIE LEE
17 Assistant United States Attorney

18 */s/ Candis Mitchell*
19 CANDIS MITCHELL
20 Attorney for Defendant Carlos Vasquez

1 [PROPOSED] Order
2

3 For the reasons stated above, this matter is continued until June 27, 2014, for another status. The
4 Court finds that the exclusion of time from March 21, 2014, through June 27, 2014, is warranted and that
5 the failure to grant the requested continuance would deny the defendant effective preparation of counsel
6 and would result in a miscarriage of justice. 18 U.S.C. § 3161(h)(7)(B)(iv).

7 IT IS SO ORDERED.
8

9 Dated: 3/14/14



10 THE HONORABLE SUSAN ILLSTON
11 United States District Judge